Case: 1:15-cv-01670-JG Doc #: 30 Filed: 01/21/16 1 of 1. PageID #: 460

Motion for extension o	f time until 1/27/16 to respond t	to disco	very approved 1/21/16			
UNITED STATES FOR THE NORTHE		HERN	ATES DISTRICT COURT ERN DISTRICT OF OHIO RN DIVISION		16 JUL 15	Service of the servic
CHRISTINE J. FORGUES		)	Case NO. 1:15-cv-1670		-7	Ţ.
Plaintiff, v.		) ) )	JUDGE JAMES GWIN			
SELECT PO	ORTFOLIO SERVICES, INC.	)	MAGISTRATE JUDGE MO	CHARGH		
	Defendant(s)	)				

## PLAINTIFF'S AGREED MOTION FOR EXTENSION OF TIME TO REPLY TO DEFEND'S DISCOVERY REQUEST

Unrepresented Plaintiff and consumer Christine J. Forgues respectfully moves this Court for an Order granting her an Extension of time in which to reply to defendant's discovery pursuant to Fed.R.CivP. 6(b). Consumer-Plaintiff has engaged competent counsel for representation in the instant action. Contemporaneously with the filing of the instant motion, Counsel for Consumer—Plaintiff is filing his motion for Pro Hac Vice admission in the instant action. Newly engaged counsel has requested a short time to become familiar with the facts and issues of this action. Consumer-Plaintiff, through newly engaged counsel, has conferred in good faith with counsel for the defendant regarding the relief sought herein. Defense counsel has courteously agreed to an extension of time to respond to discovery until January 27, 2015, thus allowing newly engaged counsel the time to become familiar with the file.

Wherefore, Christine J. Forgues, respectfully requests this Court Grant the extension sought herein and for such other relief as this Court deems just and proper.

Respectfully submitted,

Christine J, Forgues, Consumer-Plaintiff